

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GEM YIELD BAHAMAS LIMITED and GEM
GLOBAL YIELD LLC SCS,

Petitioners,

vs.

MULLEN TECHNOLOGIES, INC. and MULLEN
AUTOMOTIVE, INC.,

Respondents.

Case No. 1:24-cv-01120

**NOTICE OF APPLICATION TO CONFIRM AND ENTER JUDGMENT ON
INTERIM MEASURES ARBITRATION AWARD**

PLEASE TAKE NOTICE that, upon the annexed Application to Confirm and Enter Judgment on Interim Arbitration Award, dated February 13, 2024 (the “Application”), the Declaration of Alexander L. Cheney and exhibits attached thereto, and the accompanying Petitioners’ Memorandum of Law in Support of Application to Confirm and Enter Judgment on Interim Measures Arbitration Award, Petitioners GEM Yield Bahamas Limited and GEM Global Yield LLC SCS (“Petitioners”), by their undersigned attorneys, will petition this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be set by the Court, pursuant to the New York Convention on the Recognition and Enforcement of Foreign Arbitral Awards, which is implemented by Chapter 2 of the Federal Arbitration Act, 9 U.S.C. § 201 *et seq.*, for an Order (i) confirming an interim measures nondomestic arbitration award under the Court’s primary jurisdiction issued on January 24, 2024 (the “Interim Measures Order”) by the arbitrator in an arbitration proceeding between Petitioners and Respondents Mullen Technologies, Inc. and Mullen

Automotive, Inc. (collectively, “Mullen” or “Respondents”), entitled *GEM Yield Bahamas Limited and GEM Global Yield LLC SCS v. Mullen Technologies, Inc. and Mullen Automotive, Inc.*, AAA Case No. 01-21-0016-7001 (the “Arbitration”); (ii) directing that judgment be entered upon the Interim Measures Order, and (iii) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Respondents’ deadline to respond to the Application is as set forth in Local Civil Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York (the “Local Rules”), and that a hearing, if any, will be set as provided by Local Civil Rule 6.1(c) of the Local Rules.

PLEASE TAKE FURTHER NOTICE that failure to timely appear and defend may result in a judgment of default against Respondents for relief demanded by Petitioners.

Dated: February 16, 2024

WILLKIE FARR & GALLAGHER LLP

/s/ Alexander L. Cheney

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